

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY, and
MYRTLE HATHAWAY,

Plaintiffs,

v.

PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL MANAGEMENT
LIMITED PARTNERSHIP,

Defendants.

Civil Action No. 04-10988-GAO

**PLAINTIFFS' ASSENTED TO MOTION FOR LEAVE TO FILE A REPLY
MEMORANDUM UNDER SEAL IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS CONCERNING PUTNAM'S
NON-MUTUAL FUND INSTITUTIONAL CLIENTS**

Plaintiffs respectfully move the Court, pursuant to Local Rule 7.1(B)(3) and Local Rule 7.2, for leave to file a reply memorandum under seal in further support of their motion for an order compelling Putnam Investment Management, LLC, Putnam Retail Management Limited Partnership, and Putnam Advisory Company, LLC (collectively, "Putnam") to produce documents concerning certain of its non-mutual fund institutional clients. As grounds for this motion, Plaintiffs state as follows:

1. On December 8, 2006, Plaintiffs filed Plaintiffs' Motion to Compel Production of Documents Concerning Putnam's Non-Mutual Fund Institutional Clients ("Motion to Compel"). The Motion to Compel was filed under seal in accordance with the Court's Order dated November 13, 2006.
2. On December 22, 2006, Putnam filed its Opposition to Plaintiffs' Motion to Compel. The Opposition was filed under seal in accordance with the Court's Order dated December 21, 2006.

3. Plaintiffs' proposed Reply Memorandum is needed to address concisely the arguments and authorities that Putnam raises in its Opposition.

4. The Reply Memorandum should be filed under seal for the reasons set forth in Plaintiffs' November 2, 2006 Assented-To Motion to Impound (Docket No. 76) and maintained in a manner consistent with the Court's November 13, 2006 Order.

5. Putnam assents to the relief sought by this motion.

CERTIFICATION UNDER LOCAL RULE 7.1(a)(2)

The undersigned hereby certifies that Plaintiffs' counsel has conferred with counsel for Putnam, who assents to the relief sought by this motion.

Dated: December 28, 2006

Respectfully submitted,

/s/ Lisa A. Furnald

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CERTIFICATE OF SERVICE

I, Lisa A. Furnald, hereby certify that this document filed through the ECF system on December 28, 2006, will be served electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to non-registered participants.

/s/ Lisa A. Furnald

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